

REMARKS

The Examiner rejected claims 1-10 under 35 U.S.C. § 112, first paragraph, as allegedly failing to comply with the written description requirement.

The Examiner rejected claims 1-7 under 35 U.S.C. § 102(e) as allegedly being anticipated by Kobayashi *et al.* (cited US 6,562,219).

The Examiner rejected claim 1 and 3-10 under 35 U.S.C. § 102(e) as allegedly being anticipated by Pan *et al.* (cited US 2005/0054202).

Applicants respectfully traverse the § 112 and § 102 rejections with the following arguments.

35 U.S.C. § 112, First Paragraph

The Examiner rejected claims 1-10 under 35 U.S.C. § 112, first paragraph, as allegedly failing to comply with the written description requirement. More specifically, the Examiner alleged that the step of “determining” of claim 1 is **not inherently required** in the specification. In response, Applicants deleted the “determining” step of claim 1.

35 U.S.C. § 102(e)

The Examiner rejected claims 1-7 under 35 U.S.C. § 102(e) as allegedly being anticipated by Kobayashi *et al.* (cited US 6,562,219).

Regarding claim 1, Applicants respectfully contend that Kobayashi does not anticipate claim 1, because Kobayashi does not teach each and every feature of claim 1. For example, Kobayashi does not teach “transferring the semiconductor structure and the seed layer out of the tool resulting in the seed layer being exposed to the ambient environment surrounding the tool **while a temperature of the seed layer is above the water condensation temperature**” of claim 1 (bold emphasis added).

More specifically, Kobayashi may allegedly teach transferring the semiconductor structure including the seed layer 4 (FIG. 2B) out of the tool (FIG. 1) to the ambient environment surrounding the tool (column 4, lines 54-59). However, this transferring step of Kobayashi is performed **not** on the condition that **the temperature of the seed layer 4 is above the water condensation temperature** of the ambient environment as claimed in claim 1.

Based on the preceding arguments, Applicants respectfully maintain that Kobayashi does not anticipate claim 1, and that claim 1 is in condition for allowance.

Regarding claim 2, claim 2 was canceled.

Regarding claims 3-7, since claims 3-7 depend from claim 1, Applicants contend that claims 3-7 are likewise in condition for allowance.

The Examiner rejected claim 1 and 3-10 under 35 U.S.C. § 102(e) as allegedly being anticipated by Pan *et al.* (cited US 2005/0054202).

Regarding claim 1, Applicants respectfully contend that Pan does not anticipate claim 1,

because Pan does not teach each and every feature of claim 1. For example, Pan does not teach “transferring the semiconductor structure and the seed layer out of the tool resulting in the seed layer being exposed to the ambient environment surrounding the tool **while a temperature of the seed layer is above the water condensation temperature**” of claim 1 (bold emphasis added).

More specifically, Pan does **not** teach how the structure (FIGs. 1A-1D) is transferred out of any tool, let alone the condition that such transferring must be performed **while the temperature of the seed layer 26 is above the water condensation temperature** of the ambient environment surrounding the tool in which the seed layer 26 is deposited as claimed in claim 1.

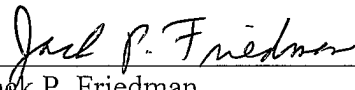
Based on the preceding arguments, Applicants respectfully maintain that Pan does not anticipate claim 1, and that claim 1 is in condition for allowance.

Regarding claims 3-10, since claims 3-10 depend from claim 1, Applicants contend that claims 3-10 are likewise in condition for allowance.

CONCLUSION

Based on the preceding arguments, Applicants respectfully believe that all pending claims and the entire application meet the acceptance criteria for allowance and therefore request favorable action. If the Examiner believes that anything further would be helpful to place the application in better condition for allowance, Applicants invites the Examiner to contact Applicants' representative at the telephone number listed below. The Director is hereby authorized to charge and/or credit Deposit Account No. 09-0456.

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